

**THE URBAN LAW FIRM**

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*Counsel for Plaintiffs Laborers Joint Trust Funds*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THE BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE  
TRUST; THE BOARD OF TRUSTEES OF  
THE CONSTRUCTION INDUSTRY AND  
LABORERS JOINT PENSION TRUST; THE  
BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS VACATION TRUST; THE  
BOARD OF TRUSTEES OF SOUTHERN  
NEVADA LABORERS LOCAL 872  
TRAINING TRUST,

Plaintiffs,

vs.

SAFETY SEALED WATER SYSTEMS  
LLC, a Domestic Limited-Liability Company;  
CRAIG EHRNREITER, individually; LORA  
LEE EHRNREITER, individually; and  
SCOTT HEFTY, individually

Defendants.

CASE NO.: 2:15-cv-00180-APG-VCF

APPLICATION FOR JUDGMENT  
DEBTOR EXAMINATION OF  
DEFENDANT/JUDGMENT DEBTOR  
CRAIG EHRNREITER, an individual

Plaintiffs BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE TRUST; BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND LABORERS JOINT PENSION TRUST; BOARD OF  
TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS VACATION TRUST; AND

1 THE BOARD OF TRUSTEES OF THE SOUTHERN NEVADA LABORERS LOCAL 872  
2 TRAINING TRUST, (hereinafter "Plaintiffs"), by and through its attorneys of record, Seth T. Floyd,  
3 Esq. of THE URBAN LAW FIRM, and pursuant to Rule 69 of the Federal Rules of Civil Procedure,  
4 hereby moves this Court for an Order directing the appearance of Defendant/Judgment Debtor Craig  
5 Ehnreiter, an individual (hereinafter "Mr. Ehnreiter"), and an Order directing the production of certain  
6 documents subject to his ownership and control.

7 This application is supported by the Declaration of Seth T. Floyd and the proposed Order filed  
8 herewith.

9 Dated: September 23, 2016

**THE URBAN LAW FIRM**

/s/ Seth T. Floyd

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***Counsel for Plaintiffs Laborers Joint Trust Funds***

**MEMORANDUM OF POINTS AND AUTHORITIES**

Rule 69 of the Federal Rules of Civil Procedure allows a Judgment Creditor to enforce a judgment through supplementary proceedings, including discovery from the Judgment Debtors.

Judgment was entered on September 7, 2016, against Safety Sealed Water Systems LLC, Craig Ehrnreiter, individually, Lora Lee Ehrnreiter, individually and Scott Hefty, individually, in the amount of \$186,452.85. The Clerk of the Court entered the Default Judgment on September 8, 2016.

Said judgment has not been vacated or reversed. The current balance due on the judgment is \$186,452.85, exclusive of interest, and it remains owing and unpaid. There is no stay of execution and execution may properly be issued.

A judgment debtor examination of Mr. Ehrnreiter is necessary to enable Judgment Creditor to discover the assets, real and personal property, current employment, etc., and any facts relating thereto, which may assist Judgment Debtor in obtaining satisfaction of the Judgment.

WHEREFORE, pursuant to FRCP 69, Judgment Creditor respectfully requests that this Court issue an Order scheduling a judgment debtor examination of Judgment Debtor Craig Ehrnreiter.

DATED: September 23, 2016

**THE URBAN LAW FIRM**

/s/ Seth T. Floyd

MICHAEL A. URBAN, Nevada State Bar No. 3875  
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SETH T. FLOYD, Nevada State Bar No. 11959  
*Counsel for Plaintiffs Laborers Joint Trust Funds*

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***Counsel for Plaintiffs Laborers Joint Trust Funds***

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SAFETY SEALED WATER SYSTEMS  
LLC, a Domestic Limited-Liability  
Company; CRAIG EHRNREITER,  
individually; LORA LEE EHRNREITER,  
individually; and SCOTT HEFTY,  
individually

Defendants.

CASE NO.: 2:15-cv-00180-APG-VCF

DECLARATION OF SETH T. FLOYD IN  
SUPPORT OF APPLICATION FOR  
JUDGMENT DEBTOR EXAMINATION  
OF DEFENDANT/JUDGMENT DEBTOR  
CRAIG EHRNREITER, an individual

I, SETH T. FLOYD, declare:

1. I am a member of the Bar of this Court and attorney of record for the Judgment  
Creditors in the above-entitled action.

2. Judgment was entered on September 7, 2016, in the amount of One Hundred Eighty Six Thousand Four Hundred Fifty Two Dollars and Eighty Five Cents (\$186,452.85), in favor of Plaintiffs and against Defendants Safety Sealed Water Systems LLC, Craig Ehrnreiter, individually, Lora Lee Ehrnreiter, individually and Scott Hefty, individually.

3. Said judgment has not been vacated or reversed. The current balance due on the judgment is \$186,452.85, exclusive of interest, remains owing and unpaid. There is no stay of execution and execution may properly be issued.

4. Craig Ehrnreiter ("Mr. Ehrnreiter") is an individual believed to reside in Las Vegas, Nevada.

5. An Order scheduling an examination of Mr. Ehrnreiter and requiring production of documents by Mr. Ehrnreiter is necessary to pursue collection of the judgment. No prior examination has been conducted.

6. I estimate the time for the examination in this matter will be approximately three hours. The subject of this examination will be the location and identification of all assets of Mr. Ehrnreiter, and all debts and obligations owed to Mr. Ehrnreiter. In addition to the appearance of Mr. Ehrnreiter, the current financial statements and records and recent past financial statements and records of Mr. Ehrnreiter are necessary for a complete examination to be conducted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on September 23, 2016, in Las Vegas, Nevada.

/s/ Seth T. Floyd  
SETH T. FLOYD

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SAFETY SEALED WATER SYSTEMS LLC,  
a Domestic Limited-Liability Company;  
CRAIG EHRNREITER, individually; LORA  
LEE EHRNREITER, individually; and SCOTT  
HEFTY, individually

Defendants.

CASE NO: 2:15-cv-00180-APG-VCF

(Proposed)

ORDER FOR JUDGMENT DEBTOR  
EXAMINATION OF DEFENDANT CRAIG  
EHRNREITER, an individual

Having considered Plaintiffs' Application for Judgment Debtor Examination of Defendant/Judgment Debtor Craig Ehrnreiter, an individual and the Declaration of Seth T. Floyd and good cause appearing,

1       **IT IS HEREBY ORDERED** that Defendant/Judgment Debtor Craig Ehrnreiter, appear in  
 2 Courtroom <sup>3D</sup> \_\_\_\_\_ at the United States District Courthouse for the District of Nevada, located at 333 Las  
 3 Vegas Blvd. South, Las Vegas, Nevada 89101, on the <sup>28th</sup> \_\_\_\_\_ day of <sup>October</sup> \_\_\_\_\_, 201<sup>6</sup>\_\_\_\_, at  
 4 10:00 a \_\_\_\_\_.m., to be sworn in for a Judgment Debtor Examination.

5       **IT IS FURTHER ORDERED** that Defendant/Judgment Debtor Craig Ehrnreiter, appear at  
 6 The Urban Law Firm, located at 4270 South Decatur Blvd., Suite A-9, Las Vegas, Nevada 89103 on  
 7 the <sup>28th</sup> \_\_\_\_\_ day of <sup>October</sup> \_\_\_\_\_, 201<sup>6</sup>\_\_\_\_, at <sup>11:00 a.m.</sup> \_\_\_\_\_.m., and answer concerning property  
 8 subject to the ownership and control of Craig Ehrnreiter (hereinafter referred to as "Mr. Ehrnreiter").

9       **IT IS FURTHER ORDERED** that Mr. Ehrnreiter brings with him the following documents  
 10 under his control or under the control of its agents, attorneys or accountants:

11       a. All financial statements prepared by or on behalf of Mr. Ehrnreiter from January 1,  
 12 2014, to the present.

13       b. All original monthly bank statements of Mr. Ehrnreiter from January 1, 2014, to the  
 14 present.

15       c. All original savings account pass books, certificates of deposit, and trust certificates in  
 16 the name of Mr. Ehrnreiter January 1, 2014, to the present.

17       d. All canceled checks drawn on any account established in the name of Mr. Ehrnreiter  
 18 from January 1, 2014, to the present.

19       e. All original negotiable instruments and negotiable securities in the name of Mr.  
 20 Ehrnreiter from January 1, 2014, to the present.

21       f. All evidence or other memoranda of any ownership interest of Mr. Ehrnreiter in any  
 22 corporation, partnership, unincorporated association or any business organized or conducted for the  
 23 production of income from January 1, 2014, to the present.

24       g. All evidence or other memoranda of any income received by Mr. Ehrnreiter January 1,  
 25 2014, to the present, to include but not limited to tax returns, insurance proceeds, or repayment of  
 26 loans.

27  
 28 ///

1           h.       All evidence or other memoranda of any employer, or place of work or employment of  
2 Mr. Ehrnreiter from January 1, 2014, to the present, including but not limited to contracts, invoices,  
3 billings, vouchers or payments.

4           i.       All evidence of any ownership interest of Mr. Ehrnreiter to include but not limited to,  
5 bills of sale, pink slips or any other record or title, in any motor vehicle, airplane, boat, equipment or  
6 machinery, from January 1, 2014, to the present.

7           j.       All evidence of any debts or repayments owed by Mr. Ehrnreiter, to include but not  
8 limited to, those arising from loans or judgments from January 1, 2014, to the present.

9           k.       Any and all evidence or other memoranda indicating that Mr. Ehrnreiter was either a  
10 plaintiff or a defendant in any lawsuit from January 1, 2014, to the present.

11          l.       Any and all evidence or memoranda indicating that Mr. Ehrnreiter received any  
12 judgment, award, bequest or devise in any lawsuit or other court action from January 1, 2014, to the  
13 present.

14          m.       Any and all evidence or memoranda indicating any ownership interest of Mr. Ehrnreiter  
15 in any patent, invention, trade name, or copyright.

16          n.       Any and all evidence or memoranda indicating an ownership interest of Mr. Ehrnreiter  
17 in any real property or developments on real property.

18          o.       Any and all evidence of the sale(s) of any real or personal property of Mr. Ehrnreiter  
19 from January 1, 2014, to the present.

20          p.       Any and all loan applications filled out by Mr. Ehrnreiter since January 1, 2014.

21          q.       Copies of all documents evidencing the sale or transfer of any assets of Mr. Ehrnreiter  
22 from January 1, 2014, to the present.

23          r.       Any and all documents evidencing any federal or State tax liability of Mr. Ehrnreiter.

24          s.       Original cash disbursement journals and/or check registers maintained in connection  
25 with any business of Mr. Ehrnreiter from January 1, 2014, to the present.

26          t.       Federal income tax returns of Mr. Ehrnreiter for the year 2014 to the present.  
27  
28

**NOTICE TO JUDGMENT DEBTOR**

**IF YOU FAIL TO APPEAR AT THE TIME AND PLACE SPECIFIED IN THIS ORDER, YOU MAY BE SUBJECT TO ARREST AND PUNISHMENT FOR CONTEMPT OF COURT AND THE COURT MAY MAKE AN ORDER REQUIRING YOU TO PAY REASONABLE ATTORNEY'S FEES INCURRED BY THE JUDGMENT CREDITORS IN THIS PROCEEDING.**

Dated this 28th of September, 2016.

By:   
UNITED STATES MAGISTRATE JUDGE

Submitted by:

**THE URBAN LAW FIRM**

By: /s/ Seth T. Floyd  
MICHAEL A. URBAN, Nevada State Bar No. 3875  
NATHAN R. RING, Nevada State Bar No. 12078  
SETH T. FLOYD, Nevada State Bar No. 11959  
***Counsel for Plaintiffs Laborers Joint Trust Funds***